Supporting Statement A

Bureau of Indian Affairs
Application for Admission to Haskell Indian Nations University and to Southwestern Indian Polytechnic Institute

OMB Control Number 1076-0114

Terms of Clearance: None

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The purpose of the collection is to enroll students at Haskell Indian Nations University and Southwestern Indian Polytechnic Institute (SIPI) and to ensure recipients meet the requirements of the Blood Quantum Act, 99 Stat. 1747; the Snyder Act, 25 Stat. 13; the Education Amendments of 1978, Public Law 95-561, Section 1102; and the Indian Appropriations of the 48th Congress, 48 Stat.180.

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

Admissions forms are used to enroll students at the Southwestern Indian Polytechnic Institute (SIPI) and Haskell Indian Nations University. The completed admissions forms are electronically entered into SIPI and Haskell Admissions and Records to maintain current data on students. The collected data is used in responding to the Bureau of Indian Education's (BIE) budget information requests from the Department of the Interior, Office of Management and

Budget, Congress and other entities as appropriate. A Privacy Act system of records notice related to this collection, BIA-22 Indian Student Records, was published in the Federal Register at 73 Fed. Reg. 40605 (July 15, 2008).

Haskell Indian Nation University Application
The application has been revised to no longer include separate sections of questions and is now a page and a half in length. Below is a chart outlining the changes that were made to the previously approved application and the rationale behind each change.

Item on revised form	Previously approved form	Rationale
I am applying as a: ❑ New Student ❑ Readmit Student ❑ Transfer Student ❑ Non-Degree-Seeking Student ❑ KS College & University fulltime/ Haskell part time	[not on form]	Added so that all applicants (new, transfer, readmit) can fill out a single form. This will save time and effort for applicants who think they fall under one category but then discover they fit a different one. Currently, such an applicant would have to complete a second, new form. Under the proposed revision, the applicant could just modify the selection here.
Preferred name	[not on form]	Having this information would allow the institution to populate rosters so that instructors would know a student's preferred name before first roll call.
"Have you attended Haskell previously? If so what was the last semester/year attended?	[not on form]	As noted on the first line of this chart, the proposed new form consolidates existing forms for new, transfer, and readmitted students. While this question was not necessary for new students, it is necessary for the other two.
Are you one of the following? ❑ Enrolled member of a U.S. federally recognized Tribe eligible for BIA/BIE education benefits; or ❑ One-fourth total degree Indian blood direct descendant of an enrolled member of a Tribe eligible for BIA/BIE education benefits. *Please provide official documentation to support the item you checked.* .	Tribal Agency: Degree of Blood or Tribal Roll Number: ___ Name of Tribe, Pueblo, Corporation, or Rancheria: ___	To align with BIA/BIE requirements on eligibility for education benefits
Have you ever been adjudicated guilty or convicted of a misdemeanor, felony or other crime? YES NO If YES, please explain on a separate sheet of paper the date, place, offense, and the outcome.	Are you currently on or pending criminal probation or parole? ○ No ○ Yes	Information about sexual offenders may not be applicable on the question as it is currently asked. The broader question allows the institutions make decisions about residence on campus.
Have you taken the ACT/SAT: (Required)	This information was not required on the previously approved form.	The use of ACT and SAT tests are widely used in many States. Adding these two choices to the application saves time in responding as the potential applicant does not have to write them out.

Credits Earned (under previous institutions)	[not on form]	As noted on the first line of this chart, the proposed new form consolidates existing forms for new, transfer, and readmitted students. While this question was not necessary for new students, it is necessary for the other two.

What major are you interested in pursuing? (NOTE: You must have a minimum of 45 college credits to be admitted into a bachelor's degree program.)
Associate Degree (2-year) Majors:
    Communication Studies
    Natural Science
    Community Health
    Para-Professional Education
    Liberal Arts
    Recreation & Fitness Management
    Media Communication
    Social Work
Baccalaureate Degree (4-year) Majors:
    Business Administration
    Elementary Education
    Environmental Science
    Indigenous & American Indian Studies
	Please write your major on the line.____	The open-ended question yielded responses of majors that are not available at Haskell. The proposed change invites students to choose from among existing majors.

Will you require student residential (on-campus) housing? YES NO	Please select the your housing status: ○ On-Campus ○ Off-Campus (Must be enrolled in 12 credits) (Please list local address below.)	This is a rewording for clarification. Institutions want to find out what the applicant desires if accepted, not the current status.

What is your current marital status?
    SINGLE
    MARRIED
    SEPARATED
    DIVORCED
    WIDOWED
	Marital Status:
	○ Single
	○ Married
	○ Separated
	○ Divorced
		Added the missing option of "widowed" for applicants who are widowed.

SIPI Application
Page One
The first part of the application asks for information about student enrollment, which semester they are applying for, and student status (new student, readmit student, transfer student, etc.). The second section requests for personal information such as the applicant's full name, permanent and commuter address, telephone numbers, date and place of birth, social security number, gender, tribal enrollment status, secondary school status, and veteran status. There is a special section for transfer or readmission students, which requests they list all previous institutions attended. The last section asks general questions for the admissions committee to identify the needs and expectations of students while attending SIPI.
Page Two

The first part of the second page requests more personal information which may impact the applicant while at school, such as marital status, tribal language, and family history regarding post-secondary education. The next section seeks information on the applicant's parents' education history. The third section requests information about the applicant's objectives and reasons for attending SIPI. The last section is the certification the applicant must sign and date, and if the applicant is under 18 years of age, there is another section for the parent/legal guardian to sign on behalf of the applicant.

Page Three and Four

These pages consist of clinical records for applicants. SIPI requires a physical examination and immunizations for public health reasons.

Page Five

This page contains the Paperwork Reduction Act and Privacy Act statements.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce the burden and specifically how this collection meets GPEA requirements.**

The applications can be retrieved from the school's website at: (SIPI Application) http://www.sipi.edu/admiss/ and (Haskell Application) http://www.haskell.edu/admissions/forms.php.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This information may be duplicated for students who have previously attended BIE secondary schools. For SIPI, applicants must submit an application for each semester they wish to attend due to possible changes to the student's information.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This collection does not impact small business or other small entities.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Without collecting this information, Haskell and SIPI would not be able to ensure applicants meet the requirements of the Blood Quantum Act, 99 Stat. 1747; the Snyder Act, 25 Stat. 13; the Education Amendments of 1978, Public Law 95-561, Section 1102; and the Indian Appropriations of the 48th Congress, 48 Stat.180,which could result in fewer eligible applicants attending the universities.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**
   * **requiring respondents to report information to the agency more often than quarterly;**
   * **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
   * **requiring respondents to submit more than an original and two copies of any document;**
   * **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
   * **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
   * **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
   * **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
   * **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that will apply to this collection.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-day notice for public comments was published in the Federal Register on April 27, 2017, 82 FR 19382. There were no comments received in response to this notice.

   Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

   Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

This spring, three students came to the Center for Institutional Effectiveness to complete the proposed new form and give feedback. We asked the students if the information was clear and concise, and all three replied affirmatively. There was a follow-up question: "If not, what could be improved?" – but since they all answered affirmatively to the first question, there were no responses to this question. Second, we asked how long the application took to fill out – and they said between 5-15 minutes each. We asked if they had other feedback to offer, and all replied in the negative.

9. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Respondents will not receive any payment, gift, or other remuneration for providing the information collection requirements.

10. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The Privacy Act, BIA-22 Indian Student Records published in the Federal Register at 73 Fed. Reg. 40605 (July 15, 2008), provides protection for confidential information. The Federal Education Rights and Privacy Act (FERPA) regulations are followed to ensure confidentiality of information.

11. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

SIPI requires a physical examination and immunizations for public health reasons. Criminal probation information is required due to dormitory requirements. Special services information is used to determine and implement any needed special services.

12. **Provide estimates of the hour burden of the collection of information. The statement should:**
    * **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
    * **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

* **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

SIPI receives approximately 3,000 applications annually (SIPI requires students to apply for each trimester) and the application takes about 30 minutes to complete. Haskell receives approximately 1,000 applications annually with each application taking an estimated 15 minutes to complete. Therefore, the total annual estimated burden is 1,750 hours or equivalent to $61,075.

Application (Annually)	Time	Burden Hours	Salary* (including 1.4 Benefits Multiplier)	Total
SIPI 3,000	30 minutes	1,500	$34.90	$52,350
Haskell 1,000	15 minutes	250	$34.90	$8,725
Total				$61,075

To obtain the hourly rate, BIA used $34.90, the wages and salaries figure for civilian workers from BLS Release USDL-17-0770, Employer Costs for Employee Compensation—March 2017, Table 1, Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, at https://www.bls.gov/news.release/pdf/ecec.pdf. This wage includes a multiplier for benefits. See www.bls.gov/news.release/pdf/ecec.pdf.

13. **Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**
    * **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
    * **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public**

comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

* **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

Haskell requires applicants to pay an application fee of $10 per application, which totals $10,000, for 1,000 applicants. SIPI does not require an application fee. The total annual non-hour cost burden to respondents is $10,000.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The review for the SIPI applications takes about 15 minutes to complete. Each of the 3,000 SIPI applications will be reviewed by a GS-5, Step 5, a GS-7, Step 5, and a GS-11, Step 5.   All of the hourly salaries, obtained at www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/17Tables/html/ GS_h.aspx, contain a 1.5 benefits multiplier.

SIPI	No. of applications reviewed	Hourly Rate (including 1.5 benefits multiplier)	Time to review each application	TOTAL
Clerk (GS-5/5)	3000	$23.25 hr	0.25 hours	$17,438
Technician (GS 7/5)	3000	$28.80 /hr	0.25 hours	$21,600
Analyst (GS 11/5)	3000	$42.63/hr	0.25 hours	$31,973
Total				**$71,011**

The review for the Haskell applications takes approximately 30 minutes to complete. Each of the 1,000 Haskell applications will be reviewed by a GS-6, Step 7, and a GS-12, Step 7. All of the hourly salaries, obtained at www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/17Tables/html/ GS_h.aspx, contain a 1.5 benefits multiplier.

Haskell	No. of applications reviewed	Hourly Rate (including 1.5 benefits multiplier)	Time to review each application	TOTAL

Clerk (GS 6/7)	1000	$29.66	0.5 hour	$14,830
Analyst (GS 12/7)	1000	$54.11	0.5 hour	$27,055
Total				**$41,885**

The total estimated annualized cost to the Federal Government is $112,896.

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

Adjustments were made to the non-hour cost burden, because applications are not required to submit applications through the U.S. mail. Additionally, the burden for the Haskell application was reduced because the form was edited to make it more efficient, therefore the burden hours for that application were reduced by 250.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information collection may be used for budget and planning purposes, but individual persons will not be identifiable.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

BIE will display the OMB Control Number and the expiration date.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

No exceptions to the certification statement are being sought